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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

PIERRE AARON HUDSON, individually,

Plaintiff,

vs.

LTF CLUB OPERATIONS COMPANY INC.
dba LIFE TIME ATHLETIC, a foreign
corporation, LIFE FITNESS, LLC, a foreign
limited-liability company; ROE GYM
EQUIPMENT MAINTENANCE COMPANY;
DOES I through X, inclusive; and ROE
CORPORATIONS III through X, inclusive,

Defendants.

Case No.: 2:24-cv-00983-RFB-MDC

**STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES**

(FIRST REQUEST)

LTF CLUB OPERATIONS COMPANY INC.,
dba LIFE TIME ATHLETIC,

Cross-claimant

vs.

LIFE FITNESS, LLC,

Cross-defendant.

IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff, PIERRE
AARON HUDSON (“Plaintiff”), Defendant, LTF CLUB OPERATIONS COMPANY INC. dba

1 LIFE TIME (“Life Time”), and, Defendant, LIFE FITNESS, LLC (“Life Fitness”), by and
2 through their attorneys of record, that the Discovery deadlines shall be continued, pursuant to LR
3 26-3, as follows:

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5 **DECLARATION OF THANE A. WILLIAMS, ESQ., IN SUPPORT OF STIPULATION**
6 **AND ORDER TO EXTEND DISCOVERY DEADLINES (FIRST REQUEST)**

7 THANE A. WILLIAMS, Esq., hereby make the following declaration pursuant to LR 26-3:

8 1. I am a resident of Clark County, Nevada. I am over the age of 18 years old and
9 competent to testify. This Declaration is based upon my personal knowledge or records reviewed
10 by me where stated, and based upon the best of my knowledge.

11 2. I am an associate at the law firm of Litchfield Cavo LLP, and am duly licensed
12 and authorized to practice law in the State of Nevada. The law firm, Litchfield Cavo LLP, was
13 retained and hired to represent Defendant Life Time in this matter.

14 3. Based on my conversations with our liability expert regarding analysis of the
15 subject cable which allegedly broke and injured Plaintiff, the process of inspection and testing
16 of the cable is expected to take between eight to ten weeks.

17 4. Custody of the cable is scheduled to pass to Life Time’s expert on June 10th, 2025.

18 5. Based on my conversations with counsel for the other parties, their experts would
19 need to schedule a joint inspection with Life Time’s expert to physically handle the cable in Las
20 Vegas, prior to shipment of the cable to a laboratory in Mooresville, North Carolina, for testing.

21 6. The current expert disclosures deadline is July 3rd for Plaintiff and August 4th for
22 Defendants.

23 I declare under penalty of perjury that the foregoing is true and correct.

24 Executed on: June 5, 2025

/s/ Thane A. Williams

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26 Thane A. Williams, Esq.

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I. DISCOVERY COMPLETED TO DATE:

1. The parties exchanged initial disclosures, and multiple supplements thereto.
2. Life Time served its first set of interrogatories and requests for production of documents to Plaintiff on March 26, 2025.
3. Plaintiff served his first sets of interrogatories, requests for production of documents, and requests for admission to Defendants Life Time and Life Fitness on March 28, 2025.
4. Plaintiff served his responses to Life Time's first set of interrogatories and requests for production of documents on April 23, 2025.
5. Life Time served its responses to Plaintiff's first set of interrogatories, requests for production of documents, and requests for admission on May 15, 2025.

II. DISCOVERY REMAINING TO BE COMPLETED:

The following discovery needs to be completed:

1. Inspection and testing of the subject cable;
2. Expert disclosures;
3. Rebuttal expert disclosures;
4. Party depositions;
5. Expert depositions;

III. GOOD CAUSE FOR EXTENSION OF DEADLINES:

Counsel for both parties have been diligently working to conduct discovery in this case. The parties are requesting an additional 120 days to complete discovery. The parties anticipate that inspection and testing of the cable, which allegedly caused Plaintiff's injuries, could take eight to ten weeks to complete, after custody of the cable is passed to Life Time's expert on June 10th, 2025. This is the parties' first request to extend deadlines.

IV. PROPOSED SCHEDULE FOR COMPLETING REMAINING DISCOVERY AND AMENDMENTS TO OTHER PRETRIAL DATES:

- 1) Close of Discovery, December 1, 2025;
- 2) Deadline to Amend Pleadings/Add Parties, September 2, 2025;

- 3) Plaintiff's Initial Expert Disclosures, October 1, 2025;
- 4) Defendant's Initial Expert Disclosures, November 3, 2025;
- 5) Rebuttal Expert Disclosures, October 30, 2025;
- 6) Deadline to File Dispositive Motions, December 31, 2025;

IT IS SO STIPULATED.

DATED this 5 June 2025.

LITCHFIELD CAVO LLP

/s/ Thane A. Williams

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*Attorneys for Defendant/Cross-Claimant,
LTF Club Operations Company, Inc. dba Life
Time*

DATED this 5 June 2025.

PETERSON BAKER, PLLC

/s/ Nikki L. Baker

NIKKI L. BAKER, ESQ.

Nevada Bar No. 6562

701 S. 7th St.

Las Vegas, NV 89101

Attorney for Life Fitness, LLC

DATED this 5 June 2025.

THE 702 FIRM INJURY ATTORNEYS

/s/ Brett J. Schwartz

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Attorneys for Plaintiff

ORDER

Upon stipulation by counsel for the parties, and good cause appearing therefore, **IT IS HEREBY ORDERED, ADJUDGED AND DECREED** that the deadlines for discovery shall be extended as follows:

| Deadline | Current Deadline | Proposed Deadline |
|---|-------------------------|--------------------------|
| Close of Discovery | September 2, 2025 | December 31, 2025 |
| Deadline to Amend Pleadings/Add Parties | June 4, 2025 | October 2, 2025 |
| Plaintiff's Initial Expert Disclosures | July 3, 2025 | October 31, 2025 |
| Defendant's Initial Expert Disclosures | August 4, 2025 | December 2, 2025 |
| Rebuttal Expert Disclosures | August 1, 2025 | December 1, 2025 |
| Dispositive Motions | October 2, 2025 | January 30, 2026 |

IT IS SO ORDERED.

DATED this June 5, 2025.

United States Magistrate Judge
6-20-25

Respectfully submitted:

LITCHFIELD CAVO LLP

/s/ Thane A. Williams
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